

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.)
) CRIMINAL NO. 21-CR-30028-MGM
BENJAMIN SHACAR,)
)
)
Defendant.)
)
)

**DEFENDANT'S MOTION TO FILE UNREDACTED REPLY TO GOVERNMENT'S
RESPONSE TO MOTION TO COMPEL DISCOVERY UNDER SEAL**

Now comes the defendant Benjamin Shacar and requests that the Court allow the defendant to file his Unredacted Reply to the Government's Response to Motion to Compel Discovery dated March 29, 2024, under seal.

In support of this motion, the defendant states that some of the content contained in the reply contains information which would be protected under ¶3 of the protective order approved by Magistrate Judge Robertson in this case on July 14, 2021. [Dkt. 25].

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil

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CERTIFICATE OF SERVICE

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date March 29, 2024.

/s/ William J. O'Neil
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